

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JASON ZIMMERMAN, on behalf of himself)	
and all others similarly situated,)	Civil Action No. 7:09-cv-04602
)	
Plaintiff,)	
)	
-against-)	
)	
PORTFOLIO RECOVERY)	
ASSOCIATES, LLC,)	
)	
Defendant.)	

PLAINTIFF'S MOTION FOR DAMAGES

Pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692k(a)(2)(B), Plaintiff, on behalf of himself and as representative to a class of similarly situated New York consumers, respectfully requests the Court enter an Order award the Plaintiff and the Class statutory damages as follows:

1. \$1,000.00 in statutory damages to Mr. Zimmerman as the named Plaintiff under 15 U.S.C. § 1692k(a)(2)(B)(i);
2. \$500,000.00 in Class Statutory Damages under 15 U.S.C. § 1692k(a)(2)(B)(ii);
- and
3. A lead plaintiff incentive award to Jason Zimmerman of \$5,000.00 for his role in representing the Class.

In support, Plaintiff submits the accompanying Memorandum of Law, the Declaration of Sergei Lemberg and the exhibits thereto.

Dated: April 23, 2012

Respectfully submitted,
By /s/ Sergei Lemberg
Sergei Lemberg, Esq.
LEMBERG & ASSOCIATES L.L.C.
1100 Summer Street, 3rd Floor
Stamford, CT 06905
Telephone: (203) 653-2250
Facsimile: (203) 653-3424
Counsel to Plaintiff and the Class

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on April 23, 2012, a copy of the foregoing was filed with the Clerk of the Court via the CM/ECF system which sent notice of such filing to the following:

Don Maurice, Esq.
Maurice & Needleman, P.C.
5 Walter E. Foran Blvd., Suite 2007
Flemington, NJ 08822
Attorneys for Defendant

/s/ Sergei Lemberg
Sergei Lemberg